

As the Court ordered, counsel for both parties conferred on September 12, 2019 via email, a true and correct copy of the parties' email is attached hereto. Defendant believes that, consistent with Fed. R. Civ. P. 34(b)(2)(B), the best method of producing documents responsive to Plaintiff's vague requests is for Plaintiff to inspect and copy the City's document at City Hall. Plaintiff disagrees with the City's position in that 1) the requests are specific, 2) any objections have been waived and 3) Defendant should provide copies of responsive documents and emails. The parties have not reached an agreement regarding these issues.

Respectfully submitted,

/s/ Sean Timmons

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ATTORNEYS FOR DEFENDANT  
City of League City

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served via the CM-ECF filing system, on this the 13th day of September, 2019, to the following:

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**ATTORNEY FOR DEFENDANTS**

City of League City and League City Police Department

*/s/ Sean C. Timmons*

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Sean C. Timmons